

PAUL B. BRICKFIELD*†
pbrickfield@brickdonlaw.com

JOSEPH R. DONAHUE*
jdonahue@brickdonlaw.com

of counsel
NANCY J. SCAPPATICCI
nscappaticci@brickdonlaw.com

SANDRA COIRA
scoira@brickdonlaw.com

*CERTIFIED CRIMINAL TRIAL LAWYER - NEW JERSEY
† MEMBER OF NEW YORK BAR



70 GRAND AVENUE
RIVER EDGE, NEW JERSEY 07661
TELEPHONE (201) 488-7707
FACSIMILE (201) 488-9559
www.brickdonlaw.com

NEW YORK OFFICE
PAUL B. BRICKFIELD P.C.
219 WESTCHESTER AVENUE
SUITE 200
PORT CHESTER, N.Y. 10573
(914) 935-9705

January 17, 2023

Via ECF and Electronic Mail

Honorable John P. Cronan, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edward Shin
Case No.: 1:19-cr-00552-JPC

Dear Judge Cronan:

I, along with Robert Basil, Esq., represented Edward Shin in the above-referenced matter. Please accept this letter as an application for an Order (i) exonerating the \$1,000,000 appearance bond signed by Mr. Shin and two others and (ii) ordering the Clerk's Office to return to Mr. Shin the \$25,000 cash bail posted by Mr. Shin on June 5, 2019 to secure the \$1,000,000 appearance bond set by the Honorable James L. Cott, U.S.M.J. (reflected in Document No.: 5).

As Your Honor is aware, Mr. Shin was sentenced to 14-months incarceration on October 6, 2022. Mr. Shin surrendered to FCI Fort Dix on December 7, 2022 to commence his sentence.

Please note that the Government consents to the exoneration of the \$1,000,000 appearance bond and return of the \$25,000 cash bail to Mr. Shin.

Please find enclosed a proposed Order for Your Honor's review.

Respectfully submitted,

/s/ Paul B. Brickfield

Paul B. Brickfield

enc.

cc: Robert Basil, Esq. (via ECF and electronic mail w/enc.)
Assistant U.S. Attorney Tara LaMorte (via ECF and electronic mail w/enc.)
Assistant U.S. Attorney Anden Chow (via ECF and electronic mail w/enc.)

Following Defendant's filing, the Government informed the Court via email that it no longer consents to Defendant's application. The Government shall file its response to this application by January 20, 2023.

SO ORDERED.

Date: January 18, 2023

New York, New York

A handwritten signature in black ink, appearing to read "John P. Cronan", written over a horizontal line.

JOHN P. CRONAN

United States District Judge